

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

OWN YOUR HUNGER LLC, a Delaware
limited liability company, LIGHTEN UP
FOODS LLC, a Delaware limited liability
company, DEFIANT FOODS LLC, a Utah
limited liability company,

Plaintiffs,

vs.

LINUS TECHNOLOGY, INC., EPOGEE
LLC, PETER RAHAL,

Defendants

Case No. _____

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING ORDER**

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR TEMPORARY
RESTRAINING ORDER**

IT IS HEREBY ORDERED pursuant to Fed. R. Civ. P. 65 that Defendants
are **IMMEDIATELY RESTRAINED AND ENJOINED** from:

1. Restricting or denying EPG access to existing customers who had access prior to
March 25, 2025;
2. Maintaining artificial supply shortages or hoarding EPG inventory beyond legitimate
business needs;
3. Withholding, hoarding, or restricting access to the admitted large EPG supply
inventory currently under Defendants' control;

4. Using claims of "pre-purchased" or "reserved" EPG supply to deny access to existing customers;
5. Creating any form of artificial scarcity through inventory manipulation or coordinated supply restrictions;
6. Coordinating to restrict EPG supply or conceal material information regarding EPG availability;
7. Using EPG control to exclude competition in EPG-dependent food markets.

IT IS FURTHER ORDERED that Defendants shall:

- A. IMMEDIATELY make available for purchase by existing EPG customers a proportional allocation of the EPG supply currently under Defendants' control;
- B. Restore EPG supply access under substantially similar terms and conditions as existed on January 1, 2025, including: .i. 7-10 business day lead times for orders of 5,000 pounds or less; ii. 50% deposit requirements for orders exceeding 5,000 pounds with reasonable lead times; iii. Commercially reasonable pricing consistent with pre-March 25, 2025 historical terms;
- C. Allocate EPG supply on a proportional basis among all qualified customers, including existing customers who had access prior to March 25, 2025, rather than exclusively to Defendants' internal operations;
- D. Within 48 hours of this Order, provide written notice to all existing EPG customers who had access prior to March 25, 2025, informing them of restored access and ordering procedures;
- E. Within 5 business days of this Order, accept and process EPG orders from existing customers under the restored terms specified herein, utilizing any existing supply as necessary to

fulfill such orders. This Order is issued without notice because immediate and irreparable injury will result before Defendants can be heard in opposition, as shown by the specific facts in the accompanying affidavit.

IT IS FURTHER ORDERED that this Temporary Restraining Order shall remain in effect for fourteen (14) days from the date of issuance, unless extended or converted to a preliminary injunction upon further proceedings.

Dated: _____

United States District Court Judge
Southern District of New York